



United States Attorney
Southern District of New York

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DOCUMENT
ELECTRONICALLY FILED
DOC #:

December 23, 2021

DATE FILED: 12/27/21

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Ronald Goland & Isaiah Smith, S1 21 Cr. 78 (KMW)*

Dear Judge Wood:

The Government writes, on behalf of the parties, in advance of the conference scheduled in this matter for January 4, 2022. In short, the parties submit that an adjournment, and corresponding exclusion time, of approximately 45 days would be appropriate.

The defense is continuing its review of the voluminous discovery in this case. In addition, the parties have been in discussions about a potential resolution. Accordingly, the parties believe that the requested adjournment would be appropriate.

If the Court agrees, the Government respectfully requests that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(1)(A), until the date of the next conference. The Government submits that the ends of justice served by an exclusion of time outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow for the defendants' continued review of the voluminous discovery in this case and to discuss a potential resolution with the Government. In addition, such an exclusion will help ensure the effective assistance of counsel and help avoid any possible miscarriage of justice. Counsel for both defendants consent to the request.

The conference is adjourned to
February 22, 2022, at 11:00 a.m.
Time is excluded, pursuant to
18 USC 3161(h)(1)(A), through
February 22, 2022.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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cc: Counsel of record (by ECF)

Kimba M. Wood 12/27/21
SO ORDERED